

Kennedys

Honorable Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

120 Mountain View Boulevard
Post Office Box 650
Basking Ridge, NJ 07920
USA

t +1 908.848.6300
m +1 908.861.0043

kennedyslaw.com

John.Orzel@kennedyslaw.com

13 April 2022

ROANOKE INS. V. KUEHNE + NAGEL INC.

1:21-CV-10172-RA

Dear Judge Abrams:

We are attorneys representing plaintiff, Roanoke Insurance Groupe, Inc. in the above matter and jointly with counsel for defendant, Kuehne + Nagel, Inc., Andrew R. Spector, Esq., of Spector Rubin. P.A., we refer to the Court's Order and Notice of Initial Conference, entered on December 22, 2021 and the Court's email of today regarding the obligation to provide a joint letter. We apologize for not complying with the Court's December 22, 2021 Order and assure the Court that no disrespect was intended.

The captioned matter is another in a large number of cases arising from an incident involving the container ship ONE APUS, which lost hundreds of containers while on an eastbound voyage from China. Given the number of cases that have been filed in the Southern District of New York, the ONE APUS cases have been transferred to Judge Torres.

Because there are ONE APUS cases filed in a number of Federal District Courts, a motion has been made to the United States Judicial Panel on Multidistrict Litigation, seeking a consolidation of the cases in one court. The JPL case is MDL Number 3028. The Panel has not made a determination.

Kennedys is a trading name of Kennedys CMK LLP, a limited liability partnership, in New Jersey, United States (with registered number 0450171416)

Kennedys Law LLP, a UK Limited Liability Partnership, is a partner of Kennedys CMK LLP

Kennedys offices, associations and cooperations: Argentina, Australia, Belgium, Bermuda, Brazil, Canada, Chile, China, Colombia, Denmark, Dominican Republic, England and Wales, France, Guatemala, Hong Kong, India, Ireland, Israel, Italy, Mexico, New Zealand, Northern Ireland, Norway, Oman, Pakistan, Panama, Peru, Poland, Portugal, Puerto Rico, Scotland, Singapore, Spain, Sweden, Thailand, United Arab Emirates, United States of America.

ROANOKE INS. V. KUEHNE + NAGEL INC.

1:21-cv-10172-RA

Kennedys

In light of the fact that the captioned matter arises from the ONE APUS casualty, we respectfully request that the Court stay all proceedings and transfer the matter to Judge Torres' docket. Should the Court require a formal motion, we ask that the Court set a briefing schedule.

We thank the Court for its consideration of this request.

Respectfully,

/S/ John A. Orzel

John A. Orzel
Partner
for Kennedys
Counsel for Plaintiff
Roanoke Insurance Group, Inc.

Today's conference is adjourned. The case will be reassigned to Judge Torres, and the parties shall address their request for a stay to her.

SO ORDERED.


Hon. Ronnie Abrams
04/15/22

/S/ Andrew J. Spector

Andrew R. Spector
Partner
for Spector Rubin, P.A.
Counsel for Defendant
Kuehne + Nagel Inc.